

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Ashton v. Al Qaeda Islamic Army, 02 CV 6977 (RCC)
Thomas Burnett, Sr. v. Al Baraka Investment & Develop. Corp., 03 CV 9849 (RCC)
Federal Insurance Co. v. Al Qaida, 03 CV 6978 (RCC)
Salvo v. Al Qaeda Islamic Army, 03 CV 5071 (RCC)

**AFFIRMATION OF ANDREA BIERSTEIN IN OPPOSITION TO MOTION TO DISMISS OF
NAIF BIN ABDULAZIZ AL-SAUD**

Andrea Bierstein, Esq., affirms as follows:

I am an attorney admitted to practice in New York and in this Court and am a member of the law firm Hanly Conroy Bierstein & Sheridan LLP, co-counsel for the *Burnett* plaintiffs. I submit this affirmation to transmit to the Court the following documents submitted in opposition to the motion to dismiss filed by defendant Naif bin Abdulaziz al-Saud:

1. Exhibit 1 is a true and accurate copy of an article from the Fort Worth *Star-Telegram* dated October 6, 1994 and titled "Saudi Arabian king sets up council on Islamic affairs," as it appears on Westlaw.

2. Exhibit 2 is a true and accurate copy of an article from the *Saudi Economic Survey*, dated April 26, 2000 and titled "Royal Donation to Chechen Refugees," as it appears on Westlaw.

3. Exhibit 3 is a true and accurate copy of an article from *Arab News*, dated December 27, 1999 and titled "Telethon raises SR47m for Chechnya; King Fahd donates SR18.775 million."

4. Exhibit 4 is a true and accurate copy of an article from *The Guardian* (Manchester, U.K.), dated May 5, 1993 and titled "Saudi curb on alms targets radicals' cash; Gifts to charity have funded militant groups in other countries."

5. Exhibit 5 consists of copies of (a) a letter dated July 31, 2003 from Senator Charles Schumer to Prince Bandar Bin Sultan Bin Abdul Aziz, Ambassador of Saudi Arabia to the United States; (b) an article from *The Weekly Standard* dated May 20, 2002 and titled "The Saudi Terror Subsidy"; and (c) an article from *Ain-Al-Yaqeen* dated December 7, 2001 and titled "The Kingdom of Saudi Arabia and Palestine: Facts and Achievements."

Affirmed in New York, New York on July 30, 2004



Andrea Bierstein